

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**ALFONSO HERNANDEZ,**

**Plaintiff,**

**v.**

**Case No.: 14-cv-00964 KG/SCY**

**ANDY FITZGERALD,**

**Defendant.**

**RESPONSE TO DEFENDANT’S OBJECTIONS TO  
PLAINTIFF’S AMENDED NOTICE OF DESIGNATION OF USE  
OF DEPOSITION TESTIMONY AT TRIAL**

Plaintiff, Alfonso Hernandez, by and through his attorneys of record, GORENCE & OLIVEROS, P.C. (Louren Oliveros and Amye Green) and AEQUITAS LAW, LLC (Anna C. Martinez), hereby submits his Response to Defendant’s Objections to Plaintiff’s Amended Notice of Designation of Use of Testimony at Trial.

Defendant misrepresents Plaintiff’s Amended Designation of Use of Deposition Testimony at Trial. As Plaintiff explicitly told defense counsel yesterday, the designation is merely the submission of Plaintiff’s transcript as requested by the Court in its Order Regarding Objections to Deposition Designations [Doc. 263]. Plaintiff’s Amended Designation does not contain modified or additional designations upon which this Court has not ruled.

Respectfully submitted,

GORENCE & OLIVEROS, P.C.

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2019, I filed the foregoing through this Court's CM/ECF filing system causing an electronic copy of the foregoing to be served upon all counsel of record.

/s/ Amye Green  
Amye G. Green